

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>PAN AMERICAN AIRWAYS CORP.,</b>	)	
	)	
<b>Plaintiff/Counter-Defendant,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 04-CV-10515 JLT</b>
	)	
<b>ROBERT E. BARNES,</b>	)	
	)	
<b>Defendant/Counter-Plaintiff.</b>	)	
	)	

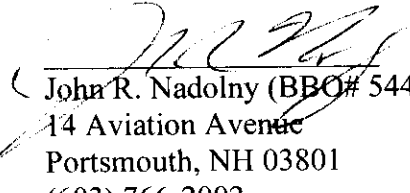
**PLAINTIFF/COUNTERDEFENDANT'S  
MOTION PURSUANT TO F.R.C.P. 56(f)**

Pursuant to Rules 7 and 56(f) of the Federal Rules of Civil Procedure, and Rule 7.1(b)(1) of the Rules of this Court, Plaintiff/Counter-Defendant Pan American Airways Corp. ("Pan Am") hereby submits its Motion to Permit Additional Discovery in response to the Motion for Partial Summary Judgment filed in this action by Defendant/Counter-Plaintiff Robert E. Barnes ("Barnes").

Pursuant to Local Rule 7.1(A)(2), counsel for Pan Am hereby certifies that he and counsel for Barnes have conferred and attempted in good faith to resolve or narrow the issues presented by this motion.

**October 28, 2004**

Respectfully submitted,

  
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